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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

CLAY CHAGAS,	)	Case No. 4:22-cv-08865-HSG
Plaintiff,	)	<b>STIPULATION AND ORDER FOR AN</b>
vs.	)	<b>EXTENSION OF TIME</b>
KILOLO KIJAKAZI,	)	
Acting Commissioner of Social Security,	)	
Defendant.	)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant shall have a 30-day extension of time, from February 10, 2023, to March 13, 2023, for Defendant to respond to Plaintiff's Complaint (Dkt. No. 1). This is Defendant's first request for an extension of time. Good cause exists for this extension.

In accordance with 42 U.S.C. § 405(g), the Commissioner files as part of the Answer a

1 certified copy of the transcript of the administrative record, including the evidence upon which  
2 the findings and decisions complained of are based. Our office has been informed by the client  
3 agency, which is the Social Security Administration, Office of Appellate Operations, that  
4 administrative record is not fully prepared. Although work on the record has progressed, the  
5 client agency needs further additional time to prepare an administrative record for the Court's  
6 review. Once completed, it will need to be reviewed to ensure that the record provided to the  
7 Court and to Complainant is complete and accurate.

9 Defendant's counsel will endeavor to complete these tasks as soon as possible. This  
10 request is made in good faith and with no intention to unduly delay the proceedings, and counsel  
11 apologizes for any inconvenience.

12 Plaintiff does not oppose Defendant's request for an extension of time.

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15 Respectfully submitted,

16 Dated: January 30, 2023

/s/ Barbara Mann  
(\*as authorized via email on 01/28/2023)  
PLAINTIFF ATTORNEY NAE  
Attorney for Plaintiff

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20 Dated: January 30, 2023

STEPHANIE M. HINDS  
United States Attorney

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22 By: /s/ Heidi L. Triesch  
HEIDI L. TRIESCH  
Special Assistant U.S. Attorney  
Attorneys for Defendant

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: 1/30/2023

  
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THE HONORABLE HAYWOOD S. GILLIAM, JR.  
United States District Court Judge